

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

1. SUSAN MCKENZIE-NEVOLAS,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. CIV-12-570-D
1. DEACONESS HOLDINGS, LLC,)	Honorable Timothy DeGiusti
d/b/a/ DEACONESS HOSPITAL)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND
RESPONSE BRIEF DEADLINE BY TWO DAYS**

COMES NOW, Defendant, Deaconess Holdings, L.L.C. (“Defendant” or the “Hospital”), and respectfully moves the Court to extend the deadline to file a Response to Plaintiff’s Motion for Partial Summary Judgment With Authority (“Motion”) [Doc. No. 84] by two (2) days, or until July 24, 2013. In support of this motion, Defendant offers the following:

1. The deadline for Defendant to respond to Plaintiff’s Motion is July 22, 2013.
2. Defendant’s counsel requests this extra time due the press of other cases, including preparing for a mediation, briefing motions, as well as preparing Defendant’s Settlement Conference Statement for the settlement conference in this case, which is also due on July 22, 2013.
3. The relief requested will not affect any other deadline in this case.
4. Defendant has not previously requested an extension of the deadline to respond to Plaintiff’s Motion. Defendant has previously requested extensions of dates in the

Scheduling Order [Doc. Nos. 25, 43, 55], an extension of time to file its Expert Report [Doc. No. 38], and an extension of time to file its Response to Plaintiff's *Daubert* Motion [Doc No. 65]. Each previous request was granted.

5. This motion is made in good faith and not intended for unnecessary delay or any other improper purpose.
6. Defendant's counsel has conferred with Plaintiff's counsel and Plaintiff's counsel does not oppose this motion.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that the Court enter an order extending the deadline for Defendant to file its Response to Plaintiff's Motion by two (2) days, or until July 24, 2013.

Respectfully submitted,

STRECKER & ASSOCIATES, P.C.

/s/ Sean W. Kilian

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of July, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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